



Human Rights & Working Conditions Policy

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Version control table

<u>Version Number</u>	<u>Purpose/Change</u>	<u>Author</u>	<u>Date</u>
V1.0	Policy Created	Claire Nicholas	28/02/2025



Policy Statement

WCM&A Ltd is committed to responsible practices in the area of human rights and working conditions.

We are committed to setting high ethical standards and conducting our business with honesty, integrity and in accordance with all applicable laws and regulations.

At WCM&A Ltd we take our legal and ethical obligations seriously. We are committed to respecting human rights throughout our operations, and we expect our suppliers to do the same.

This policy confirms our commitment to respect the fundamental rights and freedoms in accordance with The Human Rights Act 1998. Our support for these fundamental principles is reflected in our policies and practices regarding employees, suppliers, customers and the areas in which we operate.

We have a zero tolerance of behaviour that could lead to a failure to comply with human rights law. Respect for human rights is fundamental to the sustainability of our business and we care about the communities in which we operate.

We will not tolerate human rights breaches - either in our own business, or our supply chains.

We are committed to identifying, preventing, and mitigating adverse human rights impacts resulting from or caused by our business activities.

We seek to comply with the human rights and modern slavery laws in all the countries in which we operate.

All employees are responsible for ensuring they adhere with this policy. Any breaches of this policy will be dealt with under the disciplinary procedure.

Approved by:

A handwritten signature in black ink, appearing to read 'Jules Adam', is written over a horizontal line.

Jules Adam
Director

28th February 2025



Introduction

Through this policy, WCM&A Ltd commits to comply with applicable laws and regulations.

The employee handbook and separate policies are periodically reviewed and amended where appropriate to ensure that it continues to reflect best practice and legal requirements.

Employees are expected to uphold these standards and receive relevant and frequent training on our expected standards including:

- equality, diversity, inclusion
- dignity at work
- professional behaviour at work
- sexual harassment
- whistleblowing
- modern slavery risks and how to spot the signs of this.

Employees are encouraged through clear reporting practices to raise issues and report suspected violations of applicable laws, regulations and policies.

Scope

This policy applies to:

- All employees, both permanent and temporary.
- Prospective employees, in terms of recruitment and selection.
- Anyone acting on behalf of WCM&A Ltd

This policy applies to our day-to-day dealings with one another, and actions in the following areas:

- Recruitment & Selection.
- Promotion and job changes.
- Performance and Reward Management.
- Learning and Development.
- Career Management processes.
- Grievance/Disciplinary Procedures.
- Leaving the company such as retirement or redundancy.
- All events and functions organised by WCM&A Ltd.
- Any other employment matters in which fair treatment of existing or prospective employees could be at issue.

Our employees

We believe that our employees should be treated with respect and dignity and work in an environment that is free from discrimination, harassment, bullying or victimisation. Our commitment to respect human rights is demonstrated in our Employee Handbook and HR Policies and procedures, specifically:

- We will operate in compliance with applicable laws and regulations



- We will provide a safe working environment to protect the health and safety of our employees.
- Promote a workplace environment that supports and encourages the physical and mental wellbeing of all employees.
- We will not employ workers under the legal minimum age for work as stipulated by the Employment Act 2008.
- We will not make use of any forced labour in accordance with the Modern Slavery Act 2015.
- We will not discriminate against any person based on their protected characteristics and will uphold Article 14 of the Human Rights Act 1998 in respect of protection from discrimination.
- Working time directives will be adhered to as per the Working Time Regulations 1998, with opt-out clauses issued to staff.
- Employees salary will meet or exceed national minimum wage or living wage levels as appropriate.
- Responsibly, fairly and transparently collect, use, store and dispose of employee's personal data, in line with applicable laws and regulations.
- All employees should be able to work in an environment that is free from discrimination, victimisation, harassment, bullying and that all employees should be treated fairly and with dignity.
- There is a clear policy for dealing with grievances and disciplinary's detailed in the Employee Handbook.
- We have a clear whistleblowing policy detailed in the Employee Handbook and will comply with The Public Interest Disclosure Act 1998
- We have a clear policy on modern slavery in the Employee Handbook.
- We have a clear policy on equality, diversity and inclusion, in our Valuing Diversity & Dignity at Work policy, where we strive to create an environment where employees are given equal opportunities and develop an inclusive culture that welcomes and values the differences of all employees.
- We have a clear policy on Sexual Harassment Prevention and Action Policy.
- Respect the rights of our workforce to freedom of association and rights to collective bargaining.
- Adhere to the Pensions Act 2008 in relation to our NEST pension scheme.

Our Suppliers

We strive to promote adherence to Human Rights principles detailed above throughout our supply chain. We see our relationships with our suppliers as an opportunity to share best practice and through open communication, to promote mutual, continual learning and improvement with respect to human rights.

We assess all of our supplier businesses and supply chains by requiring our suppliers to complete our supplier quality questionnaire and supplier code of conduct. We require our suppliers to confirm to us that they comply with their legal obligation in relation to modern slavery and that they are committed to preventing and ensuring there is no modern slavery taking place in their business or their supply chains.



If one of our suppliers breach our policy, or are found to have modern slavery in their business, or knowingly in their supply chains, we will likely terminate our contract with them.

Our Customers

We are continually working to build and maintain relationships with organisations that share our commitment to upholding and implementing the fundamental principles of Human Rights and strive to promote best practice within our sphere of influence. We openly welcome inspection and auditing processes to ensure we continue to develop a robust and transparent Human Rights Policy.

Key areas of risk identified

Human rights breaches can occur in many ways. Below are the key areas of risk you should be aware of (although, not an exhaustive list):

- Health and safety in the workplace
- Dignity at work
- Work hours wages and benefits
- Equality, diversity and inclusion
- Personal data protection
- Freedom of association and collective bargaining
- Forced labour and human trafficking
- Child labour

Health and safety in the workplace

At WCM&A Ltd, we are committed to each one of us going home safe and well, every day. Together, we all share responsibility for the safety, health and wellbeing of ourselves and our colleagues. We are committed to ensuring that protective equipment is provided for all relevant roles, that working conditions are safe and relevant risk assessments are completed where required.

Dignity at work

We are committed to maintaining a workplace that is free from violence, discrimination, bullying, harassment, sexual harassment intimidation, victimisation and other unsafe or disruptive conditions due to internal and external threats. Where a complaint of discrimination, bullying, harassment, sexual harassment or victimisation is raised, prompt action will be taken to investigate the complaint, which may lead to corrective action including disciplinary action against the offender. Appropriate safeguards for colleagues will be provided as needed and will be maintained with respect for employee privacy and dignity.



Work hours, Wages & Benefits

WCM&A Ltd compensates employees competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime, and benefits laws (including pension) and we expect suppliers to do likewise. All employees have a contract of employment in place.

Diversity, Equality & Inclusion

WCMA&A Ltd values all employees and non-permanent workers. The diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equality and intolerance of discrimination and harassment. We seek to create and maintain a working environment that is both safe and supportive of all our people and where everyone can realise their potential. We have a Valuing Dignity & Diversity at Work Policy and are dedicated to maintaining a workplace that is free from discrimination or harassment on the basis of any status protected by applicable law.

The basis for recruitment, hiring, placement, training, compensation, and development at WCM&A is based on merit and suitability such as qualifications, performance, skills, and experience.

Regardless of personal characteristics or status, we do not tolerate disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace.

Personal data protection

We will collect, process and dispose of personal data in line with applicable laws and regulations. We have a clear Data Protection Policy and a nominated Data Protection Office (DPO) and hold a data protection registration certificate with the ICO.

We issue all prospective candidates with a candidate privacy notice which clearly explains how we collect, use, store and dispose of candidate personal data during the recruitment process.

All employees are issued with an employee privacy notice which clearly explains how we collect, process, store and dispose of their personal data during and after their employment.

Freedom of Association and Collective Bargaining

We respect our employees right to join, and not join, a union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives.



Forced Labour and Human Trafficking

WCM&A Ltd prohibits the use of all forms of forced and compulsory labour. All employment relationships are voluntary and based on mutual consent, without the threat of a penalty. We complete pre-employment checks where relevant such as right to work checks. We seek to prevent and mitigate adverse human rights impacts that are linked to our operations through our business relationships. We conduct due diligence on those we work with and expect our suppliers to do the same.

Child Labour

WCM&A Ltd prohibits all forms of child labour or child employment and does not employ workers under the legal minimum age for work as stipulated by the Employment Act 2008.

The above is with exception for the purpose of training within approved laws and regulations such as work experience, apprenticeships etc.

Monitoring and Review

The effectiveness of this policy and its procedures will be monitored and amended as and when necessary.

This policy will be reviewed annually as part of our continuing review of Company policies.